

Case 1:17-01005-ESS Doc 247 Filed 07/13/20 Entered 07/13/20 13:11:30

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK**

In re Golden,  
Tashana B. Golden  
*fka* Tashana B. Pearson,  
Debtor,

Chapter 7

Case No. 16-40809 (ESS)

Tashanna B. Golden  
*fka* Tashanna B. Pearson,  
Plaintiff,

Adv. Proc. No. 17-1005 (ESS)

v.

National Collegiate Student Loan Trust 2006-4,  
Goal Structured Solutions Trust 2016-A,  
Pennsylvania Higher Education Assistance  
Agency d/b/a American Education Services  
and Firstmark Services,

Defendants.

**DECLARATION OF TASHANNA GOLDEN**

**Tashanna Golden** declares, pursuant to 28 U.S.C. § 1746, as follows:

1. I am the Plaintiff in the above-entitled proceeding and I make this declaration in support of Plaintiff's motions for class certification, summary judgment and preliminary injunction.
2. From 2005 to 2008 I was a student at the University of Penn Law School ("Penn").
3. During the 2006 and 2007 academic school year the published cost of attendance at Penn was \$48,464. *See* Ex. A hereto.
4. During this academic year, I borrowed \$27,500 in federal guaranteed loans and received another \$21,640 in scholarships and grants. I also borrowed an additional \$7,103 from BankOne on or about September 28, 2006.
5. On or about February 26, 2008, Citibank extended an \$11,000 "bar loan" to me to cover my living expenses while I studied for the Pennsylvania bar exam.
6. On February 29, 2016, I filed a voluntary petition for relief under the Bankruptcy Code in the United States Bankruptcy Court for the Eastern District of New York.
7. I listed on Schedule E/F certain "student loans" owed, including the loans that are the subject of this action. *See* Ex. B hereto.
8. On or about August 3, 2016, this Court issued a discharge order in my bankruptcy proceeding (*see* Ex. C hereto) and on or about August 5, 2016, all creditors received notice of discharge. *See* Ex. D hereto.
9. I did not enter into an agreement under § 524(c) of the Bankruptcy Code and none of the Defendants filed an adversary proceeding to contest discharge of the subject loans.
10. After my bankruptcy, I continued to receive bills from Defendants for the payment on the subject loans described above indicating that the loans were still due and owing and the

Defendants demanded and accepted payments on the subject loans. *See e.g.*, Ex. E hereto. It was my understanding based upon these bills that the loans that are the subject of this action were not discharged in bankruptcy.

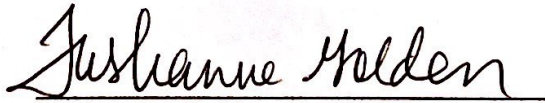
11. I understand that, if this Court certifies this proceeding as a class action, I may be named as a class representative.

12. In that capacity, I am prepared to consult on a regular basis with counsel, to keep apprised of major developments in the proceeding, and to participate in discussions with counsel with regard to any major decisions.

13. I have not been promised any remuneration for acting as a class representative in this proceeding.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: July 6, 2020

  
Tashanna Golden



**CERTIFICATE OF SERVICE**

I, George F. Carpinello, hereby certify that on the \_\_\_\_ day of June, 2020, I served the forgoing document on all counsel of record via ECF and electronic mail.

/s/ George F. Carpinello  
George F. Carpinello